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May 23, 2022

Via ECF

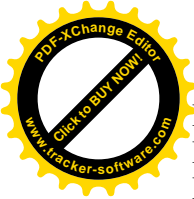
Hon. Anne Y. Shields
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: SHHA LLC v. Opal Holdings LLC, et al.
Case No.: 2:20-cv-3574 (DRH) (AYS)

Dear Judge Shields:

We represent the plaintiff in the above-referenced matter. Pursuant to Your Honor's instructions earlier today, we submit this initial joint letter on consent of all parties' counsel, in addition to Your Honor's Discovery Plan Worksheet.

1. Case name: SHHA LLC v. Opal Holdings LLC, et al.
2. Basis for federal jurisdiction: 28 U.S.C. § 1332(a) (diversity).
3. All defendants have been served and answered.
4. There are no counterclaims or crossclaims.
5. This case concerns a contract brokered by plaintiff between defendants and a non-party buyer for the purchase and sale of 1,800,000 3-ply facemasks. Plaintiff contends that it was promised a commission if it found a buyer for those masks, that it brokered such a sale, but that plaintiff has not received its commission.
6. No HIPPA compliant authorizations have been provided, nor are any anticipated or needed at this juncture.
7. By July 15, 2022, the parties will exchange the following paper discovery without the necessity for formal document requests: all written communications, including but not



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limited to emails and, text messages regarding the transactions that are the subject of this action.

8. A joint status letter will be submitted by July 22, 2022. A telephone status conference with the Court will be held on August 1, 2022, at 10:00 a.m. EST.

We remain available at the Court's convenience for an Initial Conference. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/
Leo Jacobs

Enclosures

DISCOVERY PLAN WORKSHEET**Tier I Pre-Settlement Discovery
TO BE COMPLETED IN ALL CASES**

Deadline for completion of Rule 26(a)
initial disclosures and HIPAA-
complaint records authorizations:

6/10/22

Completion date for
Phase I Discovery as
agreed upon by the
parties:
(See paragraph 7 of joint letter requirement)

7/15/22

Status conference TBD by the court:
(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post status conference)

All fact discovery completed
by: *(Presumptively 9 months
after deadline for joining
parties/amend the pleadings)*

3/12/23

Expert discovery
completed by:
*(Presumptively 3 months
after close of fact
discovery)*

6/1/23

Final date to take first step in dispositive
motion practice: *(Parties are directed to
consult the District Judge's individual
rules regarding such motion practice.
(Presumptively 30 days after close of
discovery)*

7/14/23

Joint Proposed
Pretrial Order to
be submitted:
*(30 days after dispositive motion
practice deadline)*

10/2/23